



## T. A. BLACKBURN LAW

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March 22, 2024

**Sent via mail:**

United States District Judge Arun Subramanian  
Southern District Of New York  
500 Pearl Street, Courtroom 15A  
New York, New York 10007

**Re: Zunzurovski v. Finger et al.; 1:23-cv-04883-AS**

Dear Judge Subramanian,

My firm represents Aleksandar Zunzurovski ("Mr. Zunzurovski" or "Plaintiff") in the above-referenced case. I write to you regarding the recent dismissal of the Plaintiff's case for Unjust Enrichment against the defendants. On February 28, 2024, Your Honor dismissed the Plaintiff's case with prejudice.

Mr. Zunzurovski acknowledges and accepts the Court's ruling concerning the validity of his Unjust Enrichment Claim. However, there remains a degree of uncertainty regarding the scope of the Court's decision. Specifically, it is unclear whether Your Honor's opinion dismissed only the claim for Unjust Enrichment or if the Court's assessment extends to a determination that Mr. Zunzurovski lacks a plausible cause of action against the Defendants due to the arbitrator's award.

Plaintiff accepts the Court's refusal to allow Plaintiff to amend the pleadings because Plaintiff did not detail how an amendment would not be futile in Plaintiff's motion papers. Plaintiff only seeks this clarification, as Plaintiff intends to proceed against the defendants in State Court for a claim for contribution under New York State law. A claim for contribution has a six-year statute of limitations, and the Plaintiff's prospective contribution claim is within the statute of limitation.

Mr. Zunzurovski is grateful for the Court's attention to this matter and appreciates Your Honor's time and consideration in providing the requested clarification.

Respectfully submitted,

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Cc: counsel of record via ECF.



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